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## KECK, MAHIN & CATE

FILE NUMBER 45691-450

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April 13, 1995

William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

FIDERAL CLIAM MICATIFIED COMMISSION UPTICE OF SECRETARY

Re:

Billed Party Preference For InterLATA 0+ Calls, CC Docket No. 92-77

Petition of the National Association of Attorneys General Telecommunications Subcommittee for Rules to Require Additional Disclosures by Operator Service Providers of Public Phones RM-8606

Dear Mr. Caton:

On behalf of American Public Communications Council ("APCC") enclosed is an original and four copies of a corrected attachment to the "Comments of the American Public Communications Council on the Industry Coalition's Proposal for Rate Ceilings and on the NAAG Petition for Rulemaking," filed yesterday, April 12, 1995, in response to the Commission's Public Notice, DA 95-473, released March 13, 1995. Attached to APCC's Comments was an "Analysis of 101 Operator Service Rate Complaints Filed at the FCC Between May 1, 1994 and August 15, 1994." By mistake, an incomplete version of the attachment was filed. The complete attachment is filed herewith.

A copy of this letter and the corrected attachment will be served tomorrow on all parties that APCC can identify as having filed comments in response to the Public Notice. Therefore, no party will be prejudiced by the filing of this corrected attachment.

Sincerely.

Robert F. Aldrich

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**Corrected Copy** 

## **ATTACHMENT 1**

## **ANALYSIS OF 101 OPERATOR SERVICE RATE COMPLAINTS**

FILED AT THE FCC

BETWEEN MAY 1, 1994 AND AUGUST 15, 1994

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
0.5	\$5.66	
1	\$5.38	\$3.75
1	\$5.64	
1	\$5.09	
1	\$3.42	
1	\$3.22	
1	\$6.28	
1	\$7.14	
1	\$9.85	
1	\$7.82	
1	\$6.54	
1	\$6.77	
1	\$6.86	
	3 3 4 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	
2	\$5.12	\$4.25
2	\$5.87	
2	\$4.43	
2	\$3.42	
2	\$3.01	
2	\$4.25	
2	\$4.02	
2	\$8.07	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
2	\$8.07	
2	\$8.70	
2	\$8.16	
2	\$6.57	
2	\$6.50	
2	\$7.32	
2	\$5.32	
3	\$8.19	\$4.75
3	\$5.81	
3	\$8.44	
3	\$7.39	
3	\$3.95	
3	\$6.99	
3	\$6.99	
3	\$8.86	
3	\$9.27	
3	\$24.12	
3	\$9.24	
3	\$9.25	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
4	\$11.26	\$5.25
4	\$13.31	
4	\$10.96	
4	\$8.88	
•		
5	<b>\$</b> 6.27	\$5.50
5	\$12.48	
5	\$8.68	
6	\$8.64	\$5.95
6	\$12.48	
6	\$13.38	
6	\$5.89	
6	\$13.92	
	#P	
7	\$26.74	\$6.20
	52 ( ) ( ) ( ) ( )	
9	\$13.37	\$7.00
9	\$18.00	
9	\$18.00	
9	\$17.91	
9	\$12.42	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
9	\$18.27	
		AND DESCRIPTION
10	\$20.51	\$7.35
10	\$16.97	
10	\$19.28	
10	\$19.30	
11	\$12.25	\$7.70
11	\$11.73	
11	\$19.98	
11	\$8.56	
11	\$19.18	
11	\$52.99	
	AND THE STREET, STREET	
13	\$19.84	\$8.40
13	\$14.04	
13	\$14.62	
13	\$28.21	
	Commence of the commence of th	
14	\$22.54	\$8.75
14	\$21.98	
14	\$13.17	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
14	<b>\$9.</b> 13	
A STATE OF THE STA		
15	\$23.07	\$9.10
15	\$23.10	
15	\$20.63	
15	\$42.30	
		and the second second
16	\$72.99	\$9.45
4	20.00	
17	\$10.06	\$9.80
17	<b>\$19</b> .11	
17	\$23.46	
		A STATE OF THE STA
18	\$10.84	\$10.15
18	\$24.66	
18	\$13.82	
18	\$21.24	
18	\$24.66	
19	\$29.36	\$10.50
19	\$25.08	
19	\$23.37	

DURATION IN MINUTES	COST OF CALL	PROPOSED BENCHMARKS
20	\$12.22	\$10.85
20	\$21.84	
	Section 1997	Access to the second se
24	<b>\$</b> 13.06	\$12.25
35	\$32.73	\$16.10
Control of the Control	**************************************	and the state of t
69	<b>\$</b> 77.63	\$28.00
COLUMN AND EFFE		
81	\$142.56	\$32.20
104	\$113.36	\$40.25
		Contract Con
120	\$116.28	\$45.85